



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10**

1200 Sixth Avenue, Suite 900
Seattle, Washington 98101-3140

February 24, 2009

Reply To: EPTA-088

06-052-FTA

Mr. R. F. Krochalis, Regional Administrator
Federal Transit Administration, Region 10
915 Second Avenue, Suite 3142
Seattle, WA 98174-1002

Dear Mr. Krochalis:

The U.S. Environmental Protection Agency has reviewed the **East Link Light Rail Project Draft Environmental Impact Statement (DEIS)**. We are submitting comments in accordance with our responsibilities under the National Environmental Policy Act (NEPA) and Section 309 of the Clean Air Act.

The East Link Project proposed by the Central Puget Sound Regional Transit Authority (Sound Transit) proposes to construct and operate an extension of its electric light rail transit system to improve transportation connectivity between Seattle, Mercer Island, and the east side of Lake Washington to Bellevue and Redmond in King County, Washington.

We commend FTA, Sound Transit, and the Washington State Department of Transportation (WSDOT) for their work to advance the East Link Project and to develop an exemplary NEPA document. We are pleased to see this proposed project because of its potential environmental, social, and economic benefits to the East side and greater Puget Sound region.

Based on the information provided in the DEIS, EPA has no substantial environmental concerns regarding the East Link project. We are rating the DEIS as LO, Lack of Objections (an explanation of the EPA rating system for NEPA documents is enclosed). We appreciate that the project proponents have made avoidance and minimization of impacts to sensitive areas and species an important component of alternatives development and design. Most of the residual environmental impacts, such as to streams, wetlands, and sensitive species, would be addressed during permitting and final design through consultation with resource agencies and mitigation.

The DEIS does a good job of documenting the positive environmental, social, and economic effects as compared to the No Action Alternative. For example, the project would decrease vehicle miles traveled (VMT) and vehicle hours traveled (VHT) by 0.2 percent, which would result in an annual decrease of between 31,684 and 35,244 metric tons of greenhouse gas emissions, and in energy savings of from 8,753 to 8,837 Btu/year. The project would also support the Regional and local land use goals and objectives (which would further reduce greenhouse gas emissions and energy use while protecting habitat and rural areas) by helping to

focus growth in urban centers along the East Link corridor, fostering transit oriented development and walkable, livable, healthy communities. There is also intent to incorporate low impact development techniques, which would help to control runoff and reduce pollutants in project area water bodies.

We offer the following comments for your consideration as the project moves forward and detailed mitigation plans are developed:

- Mitigation for air quality impacts during construction: We commend FTA and Sound Transit for analyzing construction-related emissions for a parking garage and maintenance facility using California's spreadsheet tool and handbook. We are also pleased to see a listing of three potential air quality construction mitigation measures in the DEIS. We recommend that these measures be adopted. There are a number of additional opportunities to reduce the effects of project construction that are listed on the Clean Construction USA website at <http://www.epa.gov/otaq/diesel/construction/>. The website also includes case studies and examples of institutional arrangements for implementing this mitigation. We encourage you to explore and adopt more of these mitigation measures where possible.
- Aquatic and terrestrial habitat mitigation opportunities: In developing mitigation for riparian, upland, and wetland impacts, we recommend seeking opportunities to improve aquatic and terrestrial habitat connectivity, e.g., improving connectivity within the riparian corridor, and among upland habitats. Provisions for wildlife habitat could also be incorporated, such as nest boxes, structure design to accommodate bats, and possibly perching/nesting sites for raptors. We would welcome the opportunity to work with project staff to develop mitigation that provides the greatest environmental benefit.

If you have questions or would like to discuss our comments, please contact Elaine Somers of my staff at (206)553-2966, or me at (206)553-1601. Thank you for involving us in the East Link project.

Sincerely,

/s/

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

Enclosure

Cc: Perry Weinberg, Sound Transit
Megan White, Washington State Dept. of Transportation